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November 21, 2022

BY ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: Marie Vic Orenia Parucha v. Jean-Yves A. Magnan and Theresa L. Durso,
No. 22 Civ. 7294 (PAE)

Dear Judge Engelmayer:

In connection with the above-caption case, and on behalf of plaintiff Marie Vic Orenia Parucha, we write together with defense counsel respectfully to request a modification of the schedule entered by the Court on November 9, 2022 (Dkt. 16).

Under the present schedule, Plaintiff's deadline to amend the complaint is November 23, 2022, and Defendants' deadline to respond to Plaintiff's amended complaint is December 23, 2022.

The parties have agreed, subject to the Court's approval, for Plaintiff to amend her complaint by December 20, 2022, and for Defendants to respond to Plaintiff's amended complaint by January 27, 2023.

The requested extension will not affect any other scheduled dates. This is the parties' second request to adjourn dates for filing of Plaintiff's anticipated amended complaint and Defendants' response thereto. On September 23, 2022, Defendants requested an extension of time to respond to Plaintiff's complaint from September 28, 2022 to November 11, 2022 (Dkt. 13), which the Court granted on September 27, 2022 (Dkt. 14). On November 8, 2022, the parties proposed a schedule under which Plaintiff would amend her complaint by November 23, 2022, and Defendants would respond to Plaintiff's amended complaint by December 23, 2022 (Dkt. 15). The Court granted the application on November 9, 2022 (Dkt. 16).

Respectfully submitted,

Lenny Sandlar

cc: Counsel of Record (via ECF)